

1 ROGER L. GRANDGENETT II, ESQ., Bar # 6323
2 Z. KATHRYN BRANSON, ESQ., Bar # 11540
3 LITTLER MENDELSON, P.C.
4 3960 Howard Hughes Parkway
5 Suite 300
6 Las Vegas, NV 89169-5937
7 Telephone: 702.862.8800
8 Fax No.: 702.862.8811
9 Email: rgrandgenett@littler.com
10 Email: kbranson@littler.com

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12 Attorneys for Defendant
13 AMERICAN AUTOMOBILE ASSOCIATION OF NORTHERN
14 CALIFORNIA, NEVADA & UTAH
15

16 UNITED STATES DISTRICT COURT
17
18 DISTRICT OF NEVADA

19 ABRAHAM LUBLIN,

20 Case No. : 2:17-cv-00021-GMN-PAL

21 Plaintiff,

22 **STIPULATION AND ORDER TO
STAY/EXTEND BRIEFING OF
DEFENDANT'S MOTION FOR SUMMARY
JUDGMENT**

23 vs.
24 AMERICAN AUTOMOBILE
25 ASSOCIATION OF NORTHERN
26 CALIFORNIA, NEVADA & UTAH, a
27 California non-profit corporation,
28

Defendant.

SECOND REQUEST

19 Plaintiff, ABRAHAM LUBLIN (“Plaintiff”) and Defendant AMERICAN AUTOMOBILE
20 ASSOCIATION OF NORTHERN CALIFORNIA, NEVADA & UTAH (“Defendant”), by and
21 through their undersigned counsel, hereby stipulate and agree to stay the deadline for Plaintiff to file
22 a response in opposition to Defendant’s Motion for Summary Judgment through and including
23 December 26, 2018, with Defendant’s reply to be due January 16, 2019.
24

25 Defendant filed its Motion for Summary Judgment on August 1, 2018 (**ECF No. 48**). On
26 August 21, 2018 this Court granted an extension for Plaintiff to file his opposition to September 7,
27 2018 and Defendant its reply on September 28, 2018 (**ECF No. 50**). On August 22, 2018 an Order
28 was entered referring the above-referenced matter to Magistrate Peggy Leen for a Settlement

1 Conference. (**ECF No. 51.**) On August 28, 2018, an Order was issued by Magistrate Judge Peggy
2 Leen scheduling a settlement conference for December 5, 2018 at 9:30 a.m. (**ECF No. 52.**)

3 In an effort to preserve the significant costs and fees associated with fully briefing a
4 summary judgment motion prior to the settlement conference, the parties have agreed to stay the
5 briefing until such time as the settlement conference has concluded. If the matter does not settle, the
6 parties have agreed to submit the remaining briefing as set forth above. Accordingly, the parties
7 have made the required showing to support their joint request to stay this matter until the outcome of
8 the settlement conference. This stipulation is made in good faith and not for purposes of delay.

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10 Dated: August 31, 2018

Dated: August 31, 2018

11 Respectfully submitted,

Respectfully submitted,

12
13 /s/ Michael P. Balaban, Esq.
14 MICHAEL P. BALABAN, ESQ.
15 LAW OFFICES OF MICHAEL P. BALABAN
16 Attorney for Plaintiff
17 ABRAHAM LUBLIN

/s/ Z. Kathryn Branson, Esq.
18 ROGER L. GRANDGENETT II, ESQ.
19 Z. KATHRYN BRANSON, ESQ.
20 LITTLER MENDELSON, P.C.
21 Attorneys for Defendant
22 AMERICAN AUTOMOBILE
23 ASSOCIATION OF NORTHERN
24 CALIFORNIA, NEVADA & UTAH

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28 **IT IS SO ORDERED.**

Dated this 4 day of September, 2018.

Gloria M. Navarro, Chief Judge
UNITED STATES DISTRICT COURT

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